UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

FILED
MAR 1 2016
U.S. DISTRICT COURT-WVND
CLARKSBURG, WV 26301

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEREMY E. SMITH,

Defendant.

Criminal No. 1:16cr12

Violations: **18 U.S.C. § 844(e)**
18 U.S.C. § 871
18 U.S.C. §§ 879(a)(1)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Threat to Damage Buildings by Use of Explosives)

On or about November 26, 2015, in Preston County, in the Northern District of West Virginia, defendant **JEREMY E. SMITH**, through the use of the mail, willfully made a threat to unlawfully damage and destroy a building and other real property by means of fire and an explosive, specifically, to place and set off explosives in government buildings in Philadelphia, New York, Chicago, Boston and Washington, D.C., all in violation of Title 18, United States Code, Section 844(e).

COUNT TWO

(Threats Against the President)

On or about January 4, 2016, in Preston County, in the Northern District of West Virginia, defendant **JEREMY E. SMITH** did knowingly and willfully deposit for conveyance in the mail and for a delivery from a post office and by a letter carrier a letter, paper, writing, print, missive, and document containing a threat to take the life of, to kidnap, and to inflict bodily harm upon the President of the United States, specifically, threatening to break and enter into the White House and capture, torture and behead the President, all in violation of Title 18, United States Code, Section 871.

COUNT THREE

(Threats Against Member of Immediate Family of Former President)

On or about January 4, 2016, in Preston County, in the Northern District of West Virginia, defendant **JEREMY E. SMITH** knowingly and willfully threatened to kill and to kidnap and to inflict bodily harm upon Hilary Clinton, a member of the immediate family of William Jefferson Clinton, a former President, by threatening to break and enter into the White House and capture, torture and behead her, all in violation of Title 18, United States Code, Sections 879(a)(1).

A true bill,

/s/ ______________________________
Foreperson
(Signature on File)

/s/ ______________________________
William J. Ihlenfeld, II
United States Attorney

Sarah W. Montoro
Assistant United States Attorney